

MEDICAL WASTE PRODUCERS TRANSPORT REQUIREMENTS

SUMMARY GUIDANCE

The Michigan Department of Environment, Great Lakes, and Environment (EGLE) [Medical Waste Regulatory Program](#) oversees the on-site generation, treatment, packaging, and storage of medical waste under the Michigan Public Health Code, Public Act 368 of 1978, [Part 138](#), and the [rules](#) promulgated thereunder. When medical waste is shipped for treatment and/or disposal, EGLE inspection staff typically review records to:

- Verify the medical waste is treated and/or disposed at a properly authorized [medical waste facility](#).
- Verify that the medical waste is removed from the producing site at least every 90 days.

The form of shipping record required under the Public Health Code is not explicitly specified. Instead, it requires the containers used for packaging, shipping, and **transport** of medical waste meet the [Michigan Motor Safety Carrier Act](#), Public Act 181 of 1963, as amended. The Michigan Motor Carrier Safety Act, [Section 480.11a](#) adopts the United States Department of Transportation (U.S. DOT) requirements for transportation of medical waste.

The federal U.S. DOT regulations require records of shipping and final destruction to be maintained by each shipper for at least three years. Most U.S. DOT hazardous materials transported over public roadways are documented using a shipping paper, which is acceptable for documenting ultimate disposal and storage timelines for meeting the Michigan Public Health Code requirements.

The U.S. DOT regulations designate infectious and potentially infectious medical waste as a Division 6.2 hazard class. [Division 6.2](#) hazard class does not have a placarding requirement like most other U.S. DOT hazardous materials. For medical waste, an infectious substance label is not required on an outer packaging if the OSHA biohazard marking is used as prescribed in 29 CFR 1910.1030(g). A bulk package of medical waste must display the biohazard marking shown to the right.



Under the U.S. DOT regulations, **the shipper offering regulated medical waste for transport is responsible for the waste until it reaches its final destination**. Moreover, to ensure safe handling, the U.S. DOT regulations requires all employees packaging medical waste for shipment and/or signing shipping papers to have **function specific, safety, and awareness training** to ensure compliance with the U.S. DOT requirements for shipping medical waste. The training must be documented and made available for inspection at the producing facility along with the shipping records.

Public Act 368, Michigan Public Health Code, Part 138 R 325.1542 - Packaging, labeling, storage, and transportation.

Rule 2. (1) In addition to the requirements established in section 13821 of the Act, containers used for packaging, shipping, and transportation of regulated medical waste shall comply with the requirements of Michigan's Motor Carrier Safety Act, [Act 181](#) of the Public Acts of 1963, as amended, being §§480.11 to 480.22 of the Michigan Compiled Laws. Section 480.11a adopts the U.S. DOT standards.

For more details on the U.S. DOT requirements for medical waste, refer to the following resources:

- [Chapter 4](#) of the [Michigan Guide to Environmental Health and Safety Regulations](#)
- U.S. DOT publications:
 - [Transporting Infectious Substances Safely](#)
 - [How to Comply with Federal Hazardous Materials Regulations](#)
- U.S. DOT Web page at www.fmcsa.dot.gov/regulations/hazardous-materials
- [Michigan State Police Commercial Vehicle Enforcement Division](#)
 - Division phone number : 517-284-3250
 - Hazardous Materials Unit, 734-780-6534

For more details on Michigan's Medical Waste Regulatory Program and its requirement for medical waste, refer to the following resources:

- Chapter 2 of the [Michigan Guide to Environmental Health and Safety Regulations](#);
- Medical Waste Program Web site: www.Michigan.gov/EGLEMedWaste
- Assistance: 800-662-9278 or e-mail medicalwaste@michigan.gov.

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